

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)	
)	CASE NUMBER: 22-MJ-8040-GCS
Plaintiff,)	
)	
vs.)	
)	
DERRON W. SMITH-JOHNSON)	
)	
Defendant.)	

CRIMINAL COMPLAINT

I, Christopher Stanley, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief:

COUNT 1

FELON IN POSSESSION OF A FIREARM

On or about March 24, 2022, in St. Clair County, within the Southern District of Illinois,

DERRON W. SMITH-JOHNSON

defendant herein, knowing that he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, on August 14, 2015, Armed Robbery, in Macon County Court case number 15-CF-216, did knowingly possess a firearm and ammunition, to wit: a Glock, model: 23, .40 caliber, semi-automatic pistol, serial number: GHW908 and 43 rounds of Speer Gold Dot .357 ammunition, and the firearm and ammunition was in and affecting commerce, all in violation, Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

AFFIDAVIT

1. As an ATF Special Agent, I investigate violations of federal and state firearms laws and other crimes involving the use, possession and trafficking of firearms, including violent crime and drug crime. I began employment with ATF in 2014.

2. I have been a law enforcement officer for approximately 17 years. From 2004-2014, I was employed as police officer with the Swansea Police Department. As a detective in Swansea, I investigated a wide variety of criminal offenses, including offenses involving homicide, stolen property, fraud, controlled substance and firearms. I was a member of the Major Case Squad of the Greater St. Louis Metropolitan Area. I am familiar with, and use, the following methods of investigation: undercover operations, the use of informants and other sources of information, interviews of individuals involved in, or witnesses to, criminal activity, search and seizure warrants, and physical, visual and electronic surveillance.

3. I received training at the Federal Law Enforcement Training Center and the ATF National Academy prior to beginning employment with ATF. Prior to that I received training through the State of Illinois to serve as an Illinois Police Officer with the Swansea Police Department.

4. The statements contained in this affidavit are based on the investigation of your Affiant, as well as information received from law enforcement officers and witnesses named herein. In support of this Complaint, your Affiant states as follows:

5. In response to an unrelated investigation, agents with Illinois State Police (ISP) responded to a residence in Belleville, Illinois, to locate and identify Derron Smith-Johnson. The Belleville residence was identified as belonging to a girlfriend of Smith-Johnson's, Shaalberia A. Willis, also known as "Shay". Upon knocking on the door of the apartment, after approximately 10 minutes of no response, Smith-Johnson answered and advised the apartment belonged to his girlfriend who was at work. Smith-Johnson went to East St. Louis Police Department for further questioning.

6. Agents located Shay at work, where she was interviewed. Shay advised she has been in an on-again/off-again relationship with Smith-Johnson for the last 2 years. Shay stated Smith-Johnson does not live at her residence and is not on the lease. Shay advised only her three minor children live at the residence with her. She said Smith-Johnson sometimes stays the night, that he will stay for a few days at her place and will then be gone for days or weeks at a time. She denied knowing where Smith-Johnson stays at when he is not there. She advised he had been gone for a week and then showed up again on Sunday, March 20, 2022. She said Smith-Johnson only has a few items of clothing at her apartment, his phone, and nothing else. Shay denied knowledge of Smith-Johnson having any guns inside her residence.

7. Shay gave consent for agents to search her residence. ISP agents drove Shay to her residence where she gave them access to her vehicle and apartment.

8. Upon conducting a search of the apartment, agents found the following items:

- Glock 23, 40 caliber pistol, bearing serial number: GHW908, loaded with 23 rounds of ammunition in an extended magazine. This firearm was found in the cold air return vent in the kitchen. The bottom 2 screws of the vent were missing.

- Glock 40 caliber 50 round drum magazine loaded with (50) 40 caliber bullets. This was found in the top right dresser drawer in the front bedroom.
- A box belonging to the drum magazine was located under the dresser in the front bedroom. Inside this box, were a box of Gold Dot 357 SIG duty ammunition with (43) bullets.

9. Inside the drum magazine box, with the Gold Dot 357 SIG duty ammunition, was Smith-Johnson's Social Security Card and Illinois State ID.

10. After the search, agents interviewed Shay again who denied knowledge of the gun, drum magazine, or ammunition. Shay advised she and her 3 juvenile children live at the residence by themselves and those items do not belong to any of them.

11. The firearm and ammunition identified were manufactured outside the State of Illinois and/or travelled in interstate commerce prior to their recovery.

12. On August 14, 2015, Smith-Johnson was convicted of Armed Robbery, in Macon County Case Number: 15CF216 and received an 8 year prison sentence.

FURTHER AFFIANT SAYETH NAUGHT.

CHRISTOPHER
STANLEY

Digitally signed by CHRISTOPHER
STANLEY
Date: 2022.03.25 11:30:18 -05'00'

Christopher Stanley
Special Agent
Bureau of Alcohol, Tobacco, and Firearms

Sworn to on the 25th day of March, 2022.

 Digitally signed by
Judge Sison 2
Date: 2022.03.25
17:06:35 -05'00'

GILBERT C. SISON
United States Magistrate Judge

STEVEN D. WEINHOEFT
United States Attorney


ALEXANDRIA BURNS
Assistant United States Attorney